

EXHIBIT E

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Santiago Laurel <slaurel@galipolaw.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>
Subject: RE: L.C. (Puga), et al. v. State of California, et al.

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Hi Amy,

We are willing to stipulate that Mr. Clark will not be testifying as to his Opinion #8 (with the exception of the sentence, “A reasonable officer facing the facts and circumstances confronting the involved officers knew or should have known that there were innocent bystanders inside the residential homes surrounding the incident location in the middle of the night.”) for the purposes of the Puga trial. We are not willing to stipulate to the exclusion of Opinions #9-10 as we believe it relates to the officers’ tactics.

Best,
Hang

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From: Amy R. Margolies <amargolies@lynberg.com>
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Hang,

Regarding Plaintiffs’ expert Mr. Clark, will Plaintiffs stipulate that for the purposes of the Puga trial, that Mr. Clark will not be testifying as to his opinions 8-10 which concern the Bottens?